

# DUKE POWER COMPANY

P.O. BOX 33189

CHARLOTTE, N.C. 28242

HAL B. TUCKER

VICE PRESIDENT  
NUCLEAR PRODUCTION

TELEPHONE  
(704) 373-4531

April 9, 1985

Mr. Harold R. Denton, Director  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Attention: Ms. E. G. Adensam, Chief  
Licensing Branch No. 4

Subject: McGuire Nuclear Station  
Docket Nos. 50-369 and 50-370  
Snubber Functional Tests Technical Specification

Dear Mr. Denton:

On March 7, 1985 Duke Power Company representatives along with other members of the OM-4 Working Group and the NRC met to resolve concerns with the "37" snubber functional test plan in the draft OM-4 document (ASME Section XI, Inspection Requirements). The "37" plan in OM-4 corresponds to snubber functional tests sample plan No. 2 in McGuire Technical Specification surveillance requirement 4.7.8.e (in fact, the "37" plan in OM-4 was taken from the McGuire Nuclear Station Technical Specification). The concerns with the "37" plan in OM-4 were: 1) the necessity of the reject line, and 2) when and how to plot test results. Both concerns were resolved and a rewrite of the OM-4 draft document was agreed to. In light of the agreed upon changes to the OM-4 document and due to the possibility (2%) of rejecting a good population (necessitating 100% functional test) with the current "37" plan reject line, a change to the current McGuire Technical Specifications is desired to alleviate any possibility of unnecessary 100% testing of the McGuire Unit 1 and/or 2 snubber populations during future refueling outages. (The NRC was notified via my March 15, 1985 letter to Dr. J. N. Grace, NRC/Region II, that Duke Power Company is selecting sample plan No. 2 for all future refueling outages at McGuire until further notified.)

Accordingly, attached are proposed license amendments to facility operating licenses NPF-9 and NPF-17 for McGuire Nuclear Station Units 1 and 2, respectively. The proposed amendments basically redefine sample plan No. 2 in view of this recent NRC review of the "37" functional test plan. Note that the reject line is deleted in Technical Specification Figure 4.7-1. As long as the reject line remains in the plan there is some possibility of rejecting a good population (and consequently requiring an unnecessary 100% testing of approximately 1600 snubbers with attendant ALARA and safety concerns, manpower utilization, outage extension, etc). Note that the proposed changes are as they are drafted to be included in the OM-4 document (based on the March meeting in Bethesda with the NRC, the Duke Power Company representative has the responsibility for the redraft on the OM-4 test plan).

8504180289 850409  
PDR ADOCK 05000369  
PDR

Adol  
9/10

w/chuck  
#150  
#795148

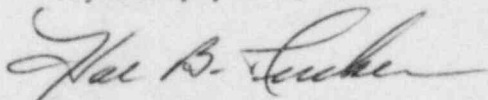
Mr. Harold R. Denton, Director  
April 9, 1985  
Page 2

Attachment 1 contains the proposed Technical Specification changes, and Attachment 2 discusses the justification and safety analysis to support the proposed changes. Included in Attachment 2 is A) a February 27, 1985 letter from Mr. D. M. Collings (DPC) to the NRC prior to the meeting which provides a statistical evaluation which eliminated the practical need for the reject line. Pursuant to 10 CFR 50.91, Attachment 3 provides an analysis performed in accordance with the standards contained in 10 CFR 50.92 which concludes that the proposed amendments do not involve a significant hazards consideration. The proposed amendments have been reviewed and determined to have no adverse safety or environmental impact.

Pursuant to 10 CFR 170.3(y), 170.12(c), and 170.21, Duke Power proposes that this application contains license amendments for McGuire Units 1 and 2 subject to fees based on the full cost of the review (to be calculated using the applicable professional staff rates shown in 10 CFR 170.20) and must be accompanied by an application fee of \$150, with the NRC to bill Duke Power at six-month intervals for all accumulated costs for the application or when review is completed, whichever is earlier. Accordingly, please find enclosed a check in the amount of \$150.

This matter has previously been discussed in telecons between Mr. P. B. Nardoci, et al. (DPC) and Mr. Darl Hood (NRC/ONRR) on March 28, 1985. In addition, the following NRC personnel attended the March 7, 1985 OM-4 Task Force Meeting: H. K. Shaw (NRC/ONRR-MEB), R. J. Kiessel (NRC/OIE-EGCB), and D. Rubinstein (NRC/ONRR-RRAB). Should there be any questions or if additional information is required, please contact P. B. Nardoci at (704) 373-7432.

Very truly yours,



Hal B. Tucker

PBN:smh

Attachments

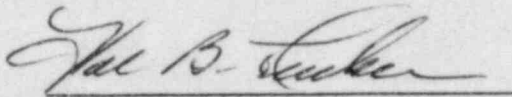
cc: Dr. J. Nelson Grace, Regional Administrator  
U.S. Nuclear Regulatory Commission  
Region II  
101 Marietta Street, NW, Suite 2900  
Atlanta, Georgia 30323

Mr. Dayne Brown, Chief  
Radiation Protection Branch  
Division of Facility Services  
Department of Human Resources  
P. O. Box 12200  
Raleigh, North Carolina 27605

Mr. W. T. Orders  
Senior Resident Inspector  
McGuire Nuclear Station

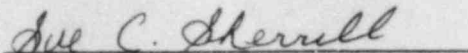
Mr. Harold R. Denton, Director  
April 9, 1985  
Page 4

HAL B. TUCKER, being duly sworn, states that he is Vice President of Duke Power Company; that he is authorized on the part of said Company to sign and file with the Nuclear Regulatory Commission this revision to the McGuire Nuclear Station License Nos. NPF-9 and NPF-17 and that all statements and matters set forth therein are true and correct to the best of his knowledge.



Hal B. Tucker, Vice President

Subscribed and sworn to before me this 9th day of April, 1985.



Notary Public

My Commission Expires:

